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January 16, 2025

The Honorable Katherine Polk Failla
United States District Judge
40 Foley Square, Room 2103
New York, NY 10007

Re: Consortium for Independent News, Inc. v. United States of America & NewsGuard Technologies, Inc.; 23-cv-07088-KPF

Dear Judge Failla:

As counsel for Plaintiff, Consortium for Independent Journalism, Inc., I am writing to advise the Court of some scheduling conflicts in connection with any oral argument on the pending motions to dismiss. I am away until the last week of January and my client's editor-in-chief, Joe Lauria, will be abroad until the week of March 10, 2025.

Mr. Lauria has expressed to me that he would like to be present in Court to directly observe any oral argument on behalf of plaintiff. For these reasons, assuming the Court planned for oral argument on the motions, may I request that argument be scheduled not earlier than the week of March 10, 2025, if convenient with the Court and counsel for the defendants. I would note that Friday, March 14, 2025, is Purim, a religious holiday, and I would be unavailable on that date.

Thank you for considering the above request.

Respectfully submitted,

S/Bruce I. Afran
Counsel for Plaintiff

Via ECF (to all counsel)